



EPA Region 5 Records Ctr.



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April 10, 2008

VIA FEDERAL EXPRESS

Tom Turner, Esq.
United States Environmental Protection Agency
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Re: United States Environmental Protection Agency (EPA) March 5, 2008,
Comprehensive Environmental Response, Compensation and Liability Act
(CERCLA) Unilateral Administrative Order (UAO), No. V-W-08-C-893
for RRG/Clayton Chemical Co. Superfund Site (Sauget, IL)

Dear Mr. Turner:

Please be advised that this firm represents Chemline, Inc. We are in receipt of certain correspondence and other documents relating to the above-referenced CERCLA matter (the "*RRG/Clayton Chemical Co. Superfund Matter*").

Apparently, there is some confusion about the appropriate contact information for Respondent Steelcote Manufacturing Company with respect to the RRG/Clayton Chemical Co. Superfund Matter. Communications relating to the RRG/Clayton Chemical Co. Superfund Matter continue to be directed to Chemline, Inc. However, Chemline, Inc. is not named as a Respondent in, and is not otherwise a party to, the RRG/Clayton Chemical Co. Superfund Matter.

The Administrative Order entered on March 5, 2008 by the EPA with respect to the RRG/Clayton Chemical Co. Superfund Matter specifically provides that the Respondents to the Superfund Matter are listed on Attachment 2 to such order. Attachment 2 lists, among other Respondents, Steelcote Manufacturing Company, and lists John Milner as the President. As we understand it, at all times relevant to the RRG/Clayton Chemical Co. Superfund Matter, Steelcote Manufacturing Company was a Missouri corporation in good standing, and John Milner was the President. According to the Missouri Secretary of State, Steelcote Manufacturing Company was only fairly recently administratively dissolved.

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Without commenting on or taking any position with respect to the facts or merits of the RRG/Clayton Chemical Co. Superfund Matter, the entity named in the Administrative Order, Steelcote Manufacturing Company, is the appropriate Respondent to the RRG/Clayton Chemical Co. Superfund Matter and the communications relating thereto should be directed to Steelcote Manufacturing Company, and not Chemline, Inc. We understand that the current contact information for John Milner/Steelcote Manufacturing Company is: 625 South Skinker #202N, St. Louis, Missouri 63105.


The confusion may have resulted from a transaction between Steelcote Manufacturing Company and Chemline, Inc. Chemline, Inc. purchased certain assets of Steelcote Manufacturing Company pursuant to an asset purchase agreement dated September 1, 2006 as part of an arms length transaction involving completely unrelated and unaffiliated parties (the "*Transaction*"). The Transaction took place several years after any violations by Steelcote Manufacturing Company could have occurred.

If you would, please verify to me that future communications will be directed to the appropriate, named Respondent. Please feel free to contact me with questions or concerns.

Sincerely yours,

LATHROP & GAGE L.C.

By: _____


Bennett S. Keller

cc: Mr. John Pantanella

This letter is not a complete recitation of the facts, positions, causes of action, claims, rights, remedies or defenses of Chemline, Inc., or of any affiliated person or entity, and is written without prejudice to, or waiver or release of, any causes of action, claims, rights, defenses or remedies Chemline, Inc., or any affiliated person or party, may have, all of which are expressly reserved and preserved.